

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

**THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,
as representative of
(LTS)**

**PROMESA
TITLE III
Case No. 17-BK-3283**

**THE COMMONWEALTH OF PUERTO RICO, et al.,
Debtors¹**

**MOTION REQUESTING EXTENSION OF TIME TO FILE CERTIFIED
TRANSLATION OF THE JUDGEMENT ENTERED BY THE COURT OF
FIRST INSTANCE OF PUERTO RICO DATED APRIL 22, 2016**

To the Honorable United States District Court Judge Laura Taylor Swain:

COME NOW, forty-four Correction Officers (“44 COs”) of the Department of Corrections and Rehabilitation of the Commonwealth of Puerto Rico (the “DCR”), who are **Plaintiffs creditors in the consolidated Judgement entered on April 22, 2016 by Court of First Instance of Aguadilla in the case of Tomassini, Norberto et als and Ivan Ayala et als** , by and through the undersigned attorney, to respectfully state, allege and pray:

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566- LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

1. The appearing 44COs filed a Motion for Allowance and Payment of an Administrative Expense Priority on June 22, 2021 at docket entry 17134. The Motion references and cites portions of the Judgment entered by the Court of Instance of Puerto Rico on April 22, 2016.

2. The Judgment must be translated into the English language for the Court's review and in compliance with PR- Local District Court Rule 5.

3. Therefore, the 44COs pray for a thirty day extension until July 22 , 2021 to file the certified translation of the Court of First Instance Judgment dated April 22, 2016.

WHEREFORE, the appearing 44COs respectfully pray for this Honorable Court to grant this request for a thirty day extension until July 22, 2021 to file the Certified translation of the referenced Judgment.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 23 day of June 2021.

I HEREBY CERTIFY, in accordance with Fed. R. Bankr. P. 9014(b), Fed. R. Bankr. P. 7004(b), and the Court's Fourteenth Amended Notice, Case Management and Administrative Procedures Order [ECF 15894-1] (the "CMP Order"), that we electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to the parties appearing in said system including the US Trustee in addition, to all those parties registered to receive notice within the electronic notification service, as well as sent a true and exact copy of the foregoing was sent by electronic mail upon all the parties listed in the Master Service UST and by U.S. mail upon all the Standard Parties listed in the CMP Order.

ATTORNEY FOR THE 44 CORRECTION OFFICERS

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